

~~CONFIDENTIAL~~

21 OCT 1959

MEMORANDUM FOR: Executive Assistant to Deputy Director (Support)

SUBJECT : Proposed Revision of [REDACTED] Training at 25X1A  
Non-CIA Facilities under the Government  
Employees Training Act

1. Subject revised regulation was sent out under date of 7 May 1959 for formal concurrence. I do not know what working level coordination, if any, took place between the Office of Training and other offices of the Deputy Director (Support) whose functions or responsibilities may be involved; neither do I know the present status of subject revision other than the fact that it apparently has not yet been published. This revision, however, was brought to my personal attention in connection with working level review of a draft travel regulation [REDACTED] As further background, I was an accredited representative of the Agency to a Civil Service Commission Conference which undertook to analyze and interpret the Government Employees Training Act. Lastly I am aware of Executive Order 10805 which exempts CIA from certain provisions of the Training Act. 25X1A

2. It is now my opinion, based admittedly on unilateral review, that revised regulation [REDACTED] is deficient in several respects and further that if one specific adjustment is made therein that the proposed regulation [REDACTED] is totally unnecessary. 25X1A

3. In view of the possibly imminent publication of [REDACTED] I hasten to point out some of the matters which I think should receive consideration. They are as follows: 25X1A

a. It seems very essential that a definition of Agency-sponsored training be provided in the regulation. A suggested definition is: "Agency-sponsored training is defined as any off-the-job training to be performed by an employee while in pay status or for which the Agency will assume all or any part of the expenses related thereto."

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b. Key considerations in the development and passing of the Training Act were its susceptibility to exploitation for personal advancement both within and outside the government service. Basic provisions of the Act require employees to commit themselves to a specific period of continuing government service in return for the training benefits provided at government expense. Notwithstanding the fact that Executive Order 10805 exempts CIA from these provisions, it is urged that the principles of obligation with penalty for violation be incorporated in [REDACTED]

25X1A

c. A further point of great importance and sensitivity in the Training Act is its provision that government employees may accept cash or scholarship contributions or awards incident to training in non-governmental facilities or the payment by non-governmental parties of travel, subsistence and other expenses. It is a requirement of the Act, in the latter instance, that an appropriate reduction be made from any payments by the government to the employee for travel, subsistence, etc. It appears to be this logical and legal requirement which has led to the development of the draft

[REDACTED] by the Office of the Comptroller. It is my opinion, however, that the basic regulation [REDACTED] should fully cover the matter of awards, scholarships and expense contributions of any sort involved in Agency-sponsored training. Authority to authorize the acceptance of such non-governmental emoluments should be centralized. Each authorizing document could then stipulate the reporting requirements on all such gifts or expense contributions and could prescribe the effect to be given thereto in the processing of Agency travel and expense vouchers. The need for the new regulation [REDACTED] would, I believe, be eliminated.

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Deputy Director of Personnel

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*This is consistent with our position, earlier transmitted to Ex Asst to DDCS WEL*